

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

FILED

OCT 04 2002

In the Matter of the Petition of Indiana Bell)
Telephone Company, Incorporated d/b/a)
Ameritech Indiana, Pursuant to I.C. 8-1-2-61,)
for a Three-Phase Process for Commission) Cause No. 41657
Review of Various Submissions of Ameritech)
Indiana to Show Compliance with Section 271(c))
of the Telecommunications Act of 1996)

INDIANA UTILITY REGULATORY COMMISSION

**VERIFIED APPLICATION TO PRACTICE BEFORE THE
INDIANA UTILITY REGULATORY COMMISSION PRO HAC VICE**

Deborah Kuhn ("Applicant") applies to the Indiana Utility Regulatory Commission (the "Commission") pursuant to Rule 3 of the Indiana Rules of Admission and Discipline and 170 IAC 1-1-5 for permission to appear and practice before the Commission in the above titled matter on behalf of Intervenor WorldCom, Inc. ("WorldCom"). In support of this application, Applicant shows the following:

1. Applicant is a member in good standing of the bar of the State of Illinois (Bar No. 06225391, admitted 1994) and is admitted to practice before its highest court. Applicant is also a member in good standing of the bars of the United States District Court for the Northern District of Illinois, as well as the U.S. Court of Appeals for the Seventh Circuit.

2. Applicant is a Senior Attorney at WorldCom, Inc. Applicant's business address is WorldCom, Inc., 205 North Michigan Avenue, 11th Floor, Chicago, Illinois 60601. Applicant's home address is 433 W. Aldine Ave., Unit 13, Chicago, Illinois 60657. No disciplinary proceeding is presently pending against Applicant in any jurisdiction, nor has one ever been brought against Applicant.

3. WorldCom has previously been granted intervention in the above titled matter by the Commission. Applicant desires to enter her appearance on behalf of WorldCom and participate in the proceedings and any evidentiary hearing in this cause. Applicant has previously appeared before the Commission in Cause No. 40611-S1, *In the Matter of the Commission Investigation and Generic Proceeding on Ameritech Indiana's Rates for Interconnection, Service, Unbundled Elements and Transport and Termination Under the Telecommunications Act of 1996 and Related Indiana Statutes*.

4. WorldCom will also be represented by its local counsel, Robert K. Johnson of Bose McKinney & Evans, LLP, 2700 First Indiana Plaza, 135 North Pennsylvania Street, Indianapolis, Indiana , 46204, in this matter.

5. Good cause exists for the appearance of Applicant in this matter, as this cause involves complex telecommunications issues, in which Applicant is a specialist.

6. Applicant has read and will be bound by the Rules of Professional Conduct adopted by the Indiana Supreme Court and consents to the jurisdiction of the State of Indiana, the Indiana Supreme Court, and the Indiana Supreme Court Disciplinary Commission to resolve any disciplinary matter that might arise as a result of the representation in this cause. Applicant further agrees to file a *Notice of Pro Hac Vice* with the Indiana Supreme Court in accordance with the provisions of Rule 3, Section 2(b) of the Indiana Rules of Admission and Discipline.

WHEREFORE, Deborah Kuhn applies to the Commission to appear and practice before it in the above titled matter and for all other just and proper relief.

Respectfully Submitted,


Deborah Kuhn

VERIFICATION

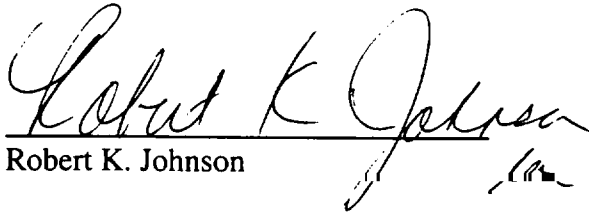
I, the undersigned, do swear and affirm that the foregoing representations are true and accurate to the best of my knowledge and belief.


Deborah Kuhn

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on all counsel of record in this proceeding this 4th day of October 2002.

Anne E. Becker
Office of the Utility Consumer Counselor
Indiana Government Center North, Room N501
100 N. Senate Ave.
Indianapolis, IN 46204-2208


Robert K. Johnson